

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

SALIM I. SINDHI

§

Plaintiff,

§

§ Civil Action No. 3:15-CV-3229-D

v.

KUNAL R. RAINA

§

Defendant.

§

PERMANENT INJUNCTION

Pursuant to the Texas Uniform Trade Secrets Act (“TUTSA”), Tex. Civ. Prac. & Rem. Code § 134A, *et seq.*, the record before the Court, all papers, pleadings and declarations filed with the Court, and for good cause shown,

IT IS HEREBY ORDERED THAT:

- (1) Defendant Kunal R. Raina, individually and d/b/a TechCruiser.com and/or TechCrusier Solutions (“Raina”), together with his agents, servants, employees and all other persons in active concert with him who receive actual notice of this injunction, is permanently enjoined from possessing, publishing, disclosing or utilizing in any form or for any purpose the trade secrets, including the source code used by generate and operate the TechCruiser Content Management System (“CMS”) that Raina misappropriated from Plaintiff Salim Sindhi, individually and d/b/a Bulletlink.com (“Sindhi”), as well as the customer lists, customer data and business model that Raina misappropriated from Sindhi (collectively referred to as the “Sindhi Trade Secrets”);
- (2) Raina shall return to Sindhi all documents and other media reflecting any of the Sindhi Trade Secrets, including all copies and partial copies thereof;

(3) Raina shall remove the Sindhi Trade Secrets from all of its computer networks and thereafter allow a computer forensic expert to be designated by Sindhi to have complete and unfettered access to Raina's computer networks to determine that The Sindhi Trade Secrets have been removed therefrom;

(4) Raina shall submit to an audit of his files, both computer and in hard copy form, to ensure that Raina no longer possesses nor uses any of the Sindhi Trade Secrets;

(5) Raina shall account to Sindhi for all uses of any of the Sindhi Trade Secrets, including but not limited to identifying each and every person exposed to any of the Sindhi Trade Secrets, identifying each and every location at which any of the Sindhi Trade Secrets were stored or used, and identifying all actual, potential or suspected disclosures of any of the Sindhi Trade Secrets outside of Bulletlink.com, with such identification including disclosure or leaks to any CMS competitor, customer or supplier; and

(6) Raina is permanently enjoined, on a worldwide basis, from manufacturing, using, utilizing, exploiting, marketing, promoting, advertising, selling, licensing, distributing, offering for sale, soliciting customers, receiving or accepting payment from customers, or in any other way dealing with any CMS products or services. Without limiting the foregoing, Raina is permanently enjoined from utilizing any of the Sindhi Trade Secrets to provide any CMS products or services to any of the following online newspaper publishers:

Amherst Today
ChickashaToday
Coastal Bend Chronicle
ColemanNOW
Cumberlandfest 2016
Drogheda Life
Eastern Suburbs Life
Fort Dodge Press

GAB News Georgetown And Beyond
Gibraltar Panorama
Homeschooler Post
Katy Trail Weekly
Lake County Magazine
MargateNewsnet
New Herald News
Norwood Record
Ottumwa Post
Radio Free Hamilton
Rancho Post-Gazette
The Bulletin Newspapers
Tillman County News
Tubman City News
Valley Center Happenings
White Rock Lake Weekly

SIGNED November 21, 2016.



SIDNEY A. FITZWATER
UNITED STATES DISTRICT JUDGE